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LAW OFFICES OF
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Attorneys for DIAMOND FARMING COMPANY,
a California corporation, and CRYSTAL ORGANIC
FARMS, a limited liability company

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 1550 (b))

ANTELOPE VALLEY GROUNDWATER
CASES

Included actions:

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Los Angeles Superior Court
Case No. BC 325201

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Kern County Superior Court
Case No. S-1500-CV 254348 NFT

Diamond Farming Company vs. City of
Lancaster
Riverside County Superior Court
Lead Case No. RIC 344436 [Consolidated
w/Case Nos. 344668 & 353840]

AND RELATED CROSS-ACTIONS.

Judicial Council Coordination No. 4408

Case No.: 1-05-CV-049053

**DEMAND FOR EXCHANGE OF
EXPERT REPORTS AND WRITINGS**

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1 TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

2 Plaintiff/Cross-Complainants, DIAMOND FARMING COMPANY and CRYSTAL
3 ORGANIC FARMS, hereby demand under Code of Civil Procedure Section 2034.210 that each party
4 produce all discoverable reports and writings, if any, made in the course of preparing an expert opinion
5 by any witness on the lists being exchanged who is an employee of the responding party or has been
6 retained by that party for the purpose of forming and expressing an opinion in anticipation of the
7 litigation or in preparation for the phase two trial of the action.

8 Dated: August 15, 2008

LeBEAU • THELEN, LLP

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By: 
BOB H. JOYCE
Attorneys for DIAMOND FARMING COMPANY,
a California corporation, and CRYSTAL ORGANIC
FARMS, a limited liability company

PROOF OF SERVICE

1 ANTELOPE VALLEY GROUNDWATER CASES
2 JUDICIAL COUNCIL PROCEEDING NO. 4408
3 CASE NO.: 1-05-CV-049053

4 I am a citizen of the United States and a resident of the county aforesaid; I am over the age
5 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter
6 Drive, Suite 300, Bakersfield, California 93309. On August 15, 2008, I served the within

7 **DEMAND FOR EXCHANGE OF EXPERT REPORTS AND WRITINGS**

8 **(BY POSTING)** I am "readily familiar" with the Court's Clarification Order.
9 Electronic service and electronic posting completed through www.scefilng.org ; All papers filed
10 in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

11 Los Angeles County Superior Court
12 111 North Hill Street
13 Los Angeles, CA 90012
14 Attn: **Department 1**
15 (213) 893-1014

Chair, Judicial Council of California
Administrative Office of the Courts
Attn: Appellate & Trial Court Judicial Services
(Civil Case Coordinator)
Carlotta Tillman
455 Golden Gate Avenue
San Francisco, CA 94102-3688
Fax (415) 865-4315

16 **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and
17 processing correspondence for mailing. Under that practice it would be deposited with the U.S.
18 Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in
19 the ordinary course of business.

20 **(STATE)** I declare under penalty of perjury under the laws of the State of
21 California that the above is true and correct, and that the foregoing was executed on August 15,
22 2008, in Bakersfield, California.

Donna M. Luis

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DONNA M. LUIS